

1 **TIFFANY & BOSCO**
2 P.A.

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6 State Bar No. 010167
7 Leonard J. McDonald
8 State Bar No. 014228
9 Attorneys for Secured Creditor

10 10-19044

11 **IN THE UNITED STATES BANKRUPTCY COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 IN RE:

14 No. 4:10-bk-19913-JMM

15 Carlos Burton and Carla Leticia Burton

16 Chapter 13

17 Debtors.

18 OBJECTION TO CHAPTER 13 PLAN

19 U.S Bank National Association, as trustee for J.P.
20 MORGAN Alternative Loan Trust 2006-S1

21 Secured Creditor,

22 vs.

23 Carlos Burton and Carla Leticia Burton, Debtors;
24 Dianne C. Kerns, Trustee.

25 Respondents.

26 U.S Bank National Association, as trustee for J.P. MORGAN Alternative Loan Trust 2006-S1, a
27 secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby objects to the proposed Chapter 13
28 Plan filed by the Debtor for the following reasons:

29 1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to U.S
30 Bank National Association, as trustee for J.P. MORGAN Alternative Loan Trust 2006-S1, pursuant to

the proof of claim in the amount of \$11,657.96. Secured creditor requests that the arrearages as set forth in its Proof of Claim be paid through the Plan. A copy of Secured Creditor's Proof of Claim is attached hereto as Exhibit "A" and made a part hereof by this reference.

2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the attorney fees as set forth in its Proof of Claim be paid through the Plan.

Secured Creditor will withdraw these objections when presented with a Stipulated Order Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as stated above.

DATED this 3rd day of August, 2010.

Respectfully submitted,

TIFFANY & BOSCO, P.A.

BY /s/ MSB #010167

Mark S. Bosco

Leonard J. McDonald

Attorneys for Secured Creditor

COPY of the foregoing mailed
August 3, 2010 to:

Carlos Burton and Carla Leticia Burton
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Debtors

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By: Julie Bush

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